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November 22, 2002

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-B204
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for
Authorization to Provide In-Region InterLATA
Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah,
Washington and Wyoming**

Subject: Qwest's EDI Documentation

Dear Ms. Dortch:

Qwest Communications International Inc. ("Qwest") submits this filing in the referenced proceeding in response to the following questions from the Commission staff regarding Qwest's EDI Documentation.

Questions: The staff asked Qwest to respond to WorldCom's *ex parte* letter dated November 6, 2002, at 9, regarding Qwest's EDI documentation. Specifically, the staff asked Qwest to discuss what it has done to resolve inconsistencies between the Local Service Ordering Guide (LSOG) and the Developer Worksheets (which are part of the IMA EDI Disclosure Document). The staff also asked about treatment of community names in the documentation and whether Qwest informs CLECs how to treat customer's building, floor, and unit number or room.

Responses:

1. Inconsistencies Between Developer Worksheets and LSOG

Each week Qwest convenes a documentation review board to review each change made to either the LSOG or the Developer Worksheets of the IMA Disclosure Document to ensure that consistent changes are made to both documents as appropriate. See Qwest III Reply Declaration on Operations Support Systems of Lynn M V Notarianni and Christie L. Doherty (“Qwest III OSS Reply Declaration”), ¶158. This process ensures that when changes are made to the documents, the documents remain consistent. However, Qwest has not undertaken a systematic effort to compare the documents to ensure that there are no existing inconsistencies. Qwest maintains that any inconsistencies between the developer worksheets and the LSOG do not impact a CLEC’s ability to code its EDI interface, as the developer worksheets are designed for and provide the information needed to successfully implement EDI. See Qwest III OSS Reply Declaration, ¶157.

On September 30, 2002, WorldCom submitted a change request (CR) regarding Qwest’s EDI documentation, pursuant to Qwest’s redesigned Change Management Process (CMP).¹ Pursuant to the standard CMP procedures, a clarification call was held on October 9 and an additional call was held on November 14, with Qwest and WorldCom. During the November 14 call, WorldCom stated that the inconsistencies between the LSOG and developer worksheets were not its concern.² Rather, WorldCom stated that it would like the developer worksheets used by EDI CLECs to more closely reflect the LSOG in terms of level of detail and format.³ The CR was presented for discussion by CLECs at the November 21 Systems CMP monthly meeting, at which participants expressed varying views on the value of making format or content changes in Qwest’s EDI documentation. Qwest agreed to hold an *ad hoc* meeting with CLECs to further define what, if any, changes need to be made. Changes in the format or content of EDI documentation need

¹ SCR093002-05 (Single Source Document for Implementing EDI). A copy of this CR is included as an exhibit to the Qwest III Reply Declaration (Reply Exhibit LN-13). For a description of the process for considering change requests, *see generally, e.g.*, Qwest II Declaration on Change Management of Dana L. Filip, ¶¶ 27-31.

² See November 14, 2002, Clarification Meeting Minutes for SCR 093002-05, at 2, where the WorldCom spokesman stated that “the concern is not the differences between the specific fields in the LSOG and DWS [developer worksheets], but the difference in the formats and level of detail in content.” The meeting minutes are included as an attachment to this *ex parte* letter.

³ *Id.*

to be carefully considered, because changes that meet the needs of one CLEC might not meet the needs of other CLECs, and such changes could impact their EDI development capabilities. Based on input obtained at the *ad hoc* meeting, the WorldCom CR will be addressed at the CMP monthly meeting in December.

We note that the record in this proceeding contains strong evidence that Qwest's EDI documentation satisfies the requirements of Section 271. As of June 2002, a total of 31 CLECs had successfully used Qwest's EDI documentation to become certified to use Qwest's EDI. *See* Qwest III OSS Reply Declaration at ¶155. In addition, as stated in the Qwest III OSS Reply Declaration, Hewlett-Packard, the pseudo-CLEC in the ROC third party test, concluded that "Qwest's EDI documentation was readily available and understandable, complete in its coverage of EDI business rules and mapping specifications, and consistent with other information provided by Qwest." *Id.* Thus, regardless of whether revisions will later be made to the EDI documentation as a result of the change management process or other mechanism, it is clear that Qwest's current EDI documentation satisfies the requirements of Section 271.

2. Treatment of Community Names

Qwest advises CLECs to validate their addresses through a pre-order address validation query prior to submitting an order.⁴ Using a properly validated address (the address received in response to the pre-order query) will ensure that the order will pass all address validation edits. In submitting a pre-order address validation query, community names can be either spelled out in full or abbreviated. If an abbreviated community name is returned in response to the pre-order address validation query, then this indicates that the CLEC should use the abbreviated community name when submitting an order. In addition to using the pre-order address validation function, a CLEC can use the PREMIS Guidelines to determine the correct community name abbreviation to use on the order.

During WorldCom's EDI implementation meetings, Qwest responded to several WorldCom questions regarding community name abbreviations by providing WorldCom with the PREMIS Guidelines, which set forth the appropriate community name abbreviations to be used in submitting orders.

⁴ See Product Catalog Pre-Ordering Overview v. 3, <http://www.uswest.com/wholesale/clecs/preordering.html>; IMA EDI Frequently Asked Questions, Pre-Order, Question 1, <http://www.uswest.com/wholesale/ima/edi/faq.html>.

In response to one of WorldCom's questions, Qwest also initially provided an incorrect answer by stating that the full community name should be used on the order. However, after further research, on November 20 Qwest provided a corrected answer to WorldCom, explaining that the abbreviated community name should be used whenever an abbreviated community name is returned on the pre-order address validation response. Additionally, an internal change to the developer worksheets has been planned for Release 12.0 that will refer the CLEC to the PREMIS Guidelines and will also more clearly specify when abbreviations should be used.⁵

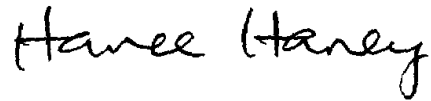
3. Treatment of Customer's Building, Floor, and Unit Number or Room

To date, Qwest's EDI implementation team is not aware that WorldCom has raised questions with the team as part of WorldCom's EDI implementation regarding whether the unit, building, and room information will be returned in one or two fields. WorldCom nevertheless states in its *ex parte* letter that while Qwest's EDI documentation indicates that such information will be returned in two fields, in fact the information is returned in only one field. See WorldCom November 6 Letter at 9. However, both the documentation and the system response show that the building, floor, and room or unit information is returned in two fields. No update is needed to the developer worksheets, as the documentation clearly shows that the CLEC is to use two fields for building, floor and room or unit.

⁵ In WorldCom's November 6, 2002, letter at 9, WorldCom states that "Qwest's LSOG documentation instructs CLECs that community names should be spelled out in full." Upon Qwest's review of the latest LSOG version, Qwest can find only one location where this instruction exists, the End User Information Form Preparation Guide. <http://www.uswest.com/wholesale/clecs/lsog.html>, at 59. In the city field in this document, the instruction is shown in Rule #4, which is specific to Facility Based Directory Listings. Facility Based Directory Listings is a separate product in the IMA system with unique rules. Although Facility Based Directory Listings require the full community name, no other IMA products have this requirement. The LSOG document thus does not have incorrect information on the abbreviation of community names, as WorldCom suggests.

The 20-page limit does not apply to this filing.

Sincerely,

A handwritten signature in black ink that reads "Hance Haney". The script is cursive and fluid, with the first name "Hance" and last name "Haney" clearly distinguishable.

R. Hance Haney

Enclosure

cc: E. Yockus
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